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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

BONNIE LYNNE STROMBERG, on behalf of
herself and all others similarly situated,

Plaintiff,

v.

OCWEN LOAN SERVICING, LLC, MORGAN
STANLEY PRIVATE BANK, N.A., RBS
CITIZENS, N.A., DOE DEFENDANTS 1-50,

Defendants.

CASE NO. 3:15-CV-04719-JST

**STIPULATION AND PROPOSED ORDER RE
MODIFICATION OF DEADLINE FOR
CLASS CERTIFICATION MOTION AND
BRIEFING SCHEDULE**

1 Plaintiff Bonnie Lynne Stromberg hereby submits this Stipulation and request for an Order
2 modifying the current case schedule by vacating the current deadline of May 16, 2018 by which
3 Plaintiff is required to file her motion for class certification and the accompanying briefing schedule
4 set forth in the Court's Order of July 26, 2017 (ECF 120), and setting a new deadline and briefing
5 schedule for the class certification motion that is tied to the date on which the Court issues an Order
6 on the pending summary judgment motion filed by Defendant Ocwen Loan Servicing, Inc. ("Ocwen").
7 In support of this request, Plaintiff states, and the parties stipulate, as follows:

8 WHEREAS, the current Scheduling Order requires that Plaintiff file her class certification
9 motion by May 16, 2028, with oppositions to the motion due by June 18, 2018 and replies by July 16,
10 2018;

11 WHEREAS, it was anticipated at the time the current Scheduling Order was entered that early
12 motions for summary judgment would be resolved before the deadline for filing the class certification
13 motion;

14 WHEREAS, the briefing schedule and the resolution of the pending summary judgment motion
15 filed by Ocwen has been delayed by Plaintiff's request for additional discovery and the Court's Order
16 granting Plaintiff's motion pursuant to Fed. R. Civ. P. 56(d);

17 WHEREAS, Plaintiff and Ocwen believe that efficient management of the case would be
18 served by resolution of Ocwen's summary judgment motion prior to class certification briefing; and
19 Plaintiff believes that certain discovery is relevant to the class certification motion, and that discovery
20 will not be available to Plaintiff on a motion to compel until after a ruling on Ocwen's motion for
21 summary judgment; and

22 WHEREAS, Plaintiff, Ocwen, and Citizens Bank, N.A. desire and consent to having the
23 deadline for filing the class certification motion moved to the date that is 30 days after the date on
24 which this Court enters an order on Ocwen's motion for summary judgment, with Defendants'
25 oppositions due thirty days after the filing of the motion and Plaintiff's reply due thirty (30) days after
26 the opposition;

27 WHEREAS, Defendant Morgan Stanley Private Bank, N.A. has agreed not to oppose this
28 request;

STIPULATION AND ~~PROPOSED~~ ORDER RE CLASS CERTIFICATION MOTION

CASE NO. 5:15-CV-04719-JST

1 THEREFORE, IT IS HEREBY STIPULATED, subject to this Court's approval, as follows:
2 The Scheduling Order of July 26, 2017, ECF 120, is hereby vacated with respect to the due date for
3 the class certification motion and the opposition and reply briefs on that motion;

4 1. Plaintiff's deadline for filing a motion for class certification is thirty (30) days after the
5 Court issues an order ruling on the merits of Ocwen's pending Motion for Summary Judgment (ECF
6 167).

7 2. Oppositions to the motion are due thirty (30) days after the motion is filed and replies
8 thirty (30) days thereafter.

9 3. All other aspects of the Court's Scheduling Order entered on July 26, 2017 remain in
10 effect.

11 SO STIPULATED

12 Dated: May 7, 2018

**SCHNEIDER WALLACE COTTRELL
KONECKY WOTKYNs LLP**

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1 *Counsel for Defendants*
2 *Ocwen Loan Servicing, LLC and*
3 *Citizens Bank (sued herein as RBS Citizens, N.A.)*

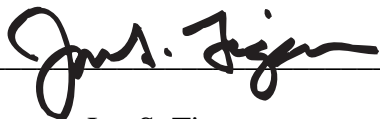
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15 *Counsel for Defendant*
16 *Morgan Stanley Private Bank, N.A.*

17 PURSUANT TO STIPULATION, AND FOR GOOD CAUSE SHOWN, IT IS SO ORDERED.

18 DATED: May 8, 2018

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20 Jon S. Tigar
21 United States District Judge
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Dated: May 8, 2018

CERTIFICATE OF SERVICE

/s/ Mark T. Johnson
Mark T. Johnson
Counsel for Plaintiff Bonnie Lynn Stromberg